

Brooks, Laura

From: Wiemelt, Karen
Sent: Wednesday, August 24, 2005 7:59 AM
To: Brooks, Laura; Dayton, Christine; Henry, Richard L.
Subject: FW: N&E of SW & Sediment Contamination

-----Original Message-----

From: David Kruchek
Sent: Wednesday, August 24, 2005 7:48 AM
To: Wiemelt, Karen
Cc: Castaneda, Norma; Serreze, Susan; Spreng, Carl; EDGAR Ethington; Ainscough, Harlen
Subject: N&E of SW & Sediment Contamination

Edgar Ethington has reviewed and has the following comments:

1) Section 4.1.4 - We have a concern with Figure 3, specifically Screening Step 4. No AOI should be eliminated simply because it is not seen or above the SW standard for one sampling event. As such, screen 4 should be removed or modified. If an analyte has been present in water above standards, just having the latest analysis below standards is not sufficient justification to eliminate it from consideration as an AOI. Therefore, this screening process should be modified and Screen 4 removed as the process is not appropriate without a historical review of the data collected. Only if the AOI has an appropriate history of declining or non-detect values over an extended period of sampling intervals, and without concerns that it could still be a AOI (GW monitoring data, historical knowledge, future possible changes in GW flow, etc), should it be removed as an AOI.

2) Section 4.1.5 - Process knowledge of materials used at Rocky Flats is limited. While some processes are well known, others are not. Process knowledge may only be used in part to make judgement calls.

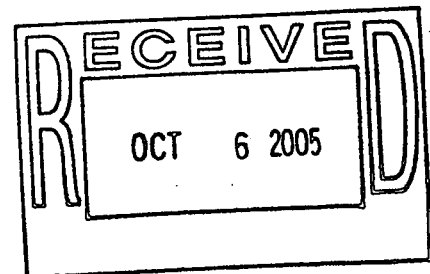
3) A section missing from Section 4.1 is the decision based on professional judgement whether or not to keep a chemical as an AOI.

4) Section 5.1.2 - An assumption is made that all the analytes have a background. The decision needs to be made first whether it is reasonable to assume a background value exists at the site. For example: thallium.

5) Section 5.1.3 - Just because a constituent in sediment is below the PRG in the past does not mean it won't exceed in the future. Remember, a new hydraulic regime will be established in the next few years. As such, please remove or properly modify this step.

6) Section 5.1.4 - Please modify this step to recognize that process knowledge at Rocky Flats is not perfectly known. As such, process knowledge may be used, in part, for a decision based on professional judgement.

We may have additional comments and will discuss at Thursdays meeting.



ADMIN RECORD